



# United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
Rocky Mountain Arsenal National Wildlife Refuge  
Building 111  
Commerce City, Colorado 80022-1748  
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David C. Shelton

JUL 25 2002

July 22, 2002

Action to: \_\_\_\_\_ Info. Only \_\_\_\_\_  
Due Date \_\_\_\_\_ Copy to: \_\_\_\_\_  
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\_\_\_\_\_

Mr. Joe Legare  
Assistant Administrator for Environment and Infrastructure  
U.S. Department of Energy - RFFO  
10808 Highway 93, Unit A  
Golden, CO 80401-8200

RE: Interim Measure/Interim Remedial Action (IM/IRA) Decision Document for the Present Landfill

Dear Mr. Legare:

The U.S. Fish and Wildlife Service (Service) has reviewed the Interim Measure/Interim Remedial Action (IM/IRA) Decision Document for the Present Landfill. The Service apologizes that these comments are late. Scott Surovchak and Dyan Foss are aware of the Service's concerns. The Service's comments parallel previous comments on the Conceptual Design Report for the Present Landfill.

The Service thanks you for the opportunity for review of this document. If you have any questions concerning these comments, please contact me at (303) 966-5413.

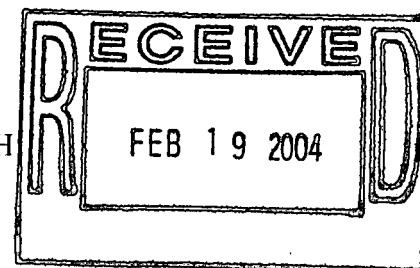
Sincerely,

R. Mark Sattelberg  
Senior Environmental Contaminants Biologist  
U.S. Fish and Wildlife Service

Attachment

cc: Tim Rehder, USEPA  
Steven Gunderson, CDPHE  
Scott Surovchak, USDOE

Dave Shelton, K-H  
Lane Butler, K-H  
Dyan Foss, K-H



DOCUMENT CLASSIFICATION  
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00-07-A-000547

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## **ATTACHMENT**

### **US FISH AND WILDLIFE SERVICE COMMENTS ON THE INTERIM MEASURE/INTERIM REMEDIAL ACTION DECISION DOCUMENT FOR THE PRESENT LANDFILL AT THE ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE GOLDEN, COLORADO**

#### **General Comments**

1. The same issues that were brought up in the review of the Conceptual Design Report are main areas of concern in this document as well.

#### **Specific Comments**

2. Section 2.9.1, after the third paragraph – There is a redundant sentence, starting with “Concentrations of NMOC’s...”
3. Section 3.1, page 26, paragraph 4 and Table 1 – The Service believes that a minimum of 48 to 54 inches of soil rooting medium and erosion protection is needed to maintain a healthy native vegetative cover.
4. Section 3.1, page 27, paragraph 4, bullet 6 – The Service would prefer to have vegetative cover on side-slopes, rather than riprap.
5. Section 3.2.2, page 29, paragraph 2 – An alternative is to cut off the current gas venting wells so they terminate in the new gas venting system.
6. Section 3.2.2, page 29, paragraph 3 – When clearing and grubbing activities take place in the spring and early summer, ground nesting birds can be disturbed. Try to schedule around nesting season.
7. Section 3.2.8, page 31 – The soil that is brought in as the rooting medium and the erosion protection layer must be tested for the soil chemistry, to make sure that it will support the native vegetation. The Service, at the Arsenal, found that the Carbon/Nitrogen ratio is very important to the success of revegetating disturbed areas.
8. Section 3.2.8, page 31 – A revegetation plan should also include success criteria, so that the revegetation process has a goal that it can be compared against.
9. Section 5.2.5, page 43, paragraph 2 – What are the criteria for filling in any animal burrows? Do they need to be a certain diameter or depth? Are there any plans for attempting to deter burrowing animals from coming onto the cover?
10. Section 5.4, page 45 paragraph 2 – Proposed corrective actions should also be discussed with the Service before implementation.
11. Section 6.2 c, page 49, paragraph 1 – Total disturbed acreage is 39 not 41.
12. Section 6.4, page 50, paragraph 2 – Has an on-site borrow site been located? This sounds like it has been.
13. Section 6.4, page 50, paragraph 3 – The second half of the paragraph is confusing. ET covers do not usually have a clay cap. Native mesic mixed prairies do not have woody species included with them, unless there is a wetland present. The last sentence sounds like you will be establishing woody species on the ET cover.
14. Section 6.4, page 50, paragraph 5 – Areas adjacent to the ET cover that will have habitats

physically altered are identified, however, areas of residual chemical risks are not identified. These should be identified as well.

15. Section 6.4, page 51, paragraph 2 – With the loss of potential habitat for the Preble's Meadow Jumping Mouse, the ecology group should be contacted to see if consultation with the Service is needed.
16. Section 6.6, page 51, paragraph 1 – Please cite references of appropriate procedures for the case where historic artifacts are encountered.
17. Section 8.7, page 61 - If a borrow source is located on-site, a reclamation plan, developed in accordance with the Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board, would probably not be sufficient to meet the purposes for which the RFNWR Act directs the Service to manage the Refuge. It is suggested that a restoration plan be developed, with participation of the Service, to restore the borrow area to as natural state as possible.